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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

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IN RE: TELESCOPES ANTITRUST  
LITIGATION

Case No. 5:20-cv-03639-EJD-VKD  
Case No. 5:20-cv-03642-EJD-VKD

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THIS DOCUMENT RELATES TO:

15

ALL ACTIONS

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*The Hon. Edward J. Davila*

**STIPULATION RE: DOCUMENT  
PRODUCTION SCHEDULE**

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Judge: Hon. Edward J. Davila  
Location: Courtroom 4 – 5th Flr.

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Case No. 5:20-cv-03639-EJD-VKD  
Case No. 5:20-cv-03642-EJD-VKD

1           WHEREAS, Direct Purchaser Plaintiffs (“DPPs”), Indirect Purchaser Plaintiffs (“IPPs”)  
 2 (collectively, “Plaintiffs”), and Defendants Suzhou Synta Optical Technology Co., Ltd, Nantong  
 3 Schmidt Opto-Electrical Technology Co. Ltd, Synta Technology Corp. of Taiwan, Olivon  
 4 Manufacturing Co. Ltd, Pacific Telescope Corp., Synta Canada International Enterprises, Ltd.,  
 5 David Shen, Sylvia Shen, Jack Chen, Jean Shen, Laurence Huen, Celestron Acquisition, LLC, Joe  
 6 Lupica, Dave Anderson, Corey Lee, and SW Technology Corporation (collectively, “Defendants”)  
 7 have engaged in multiple conferences pursuant to the Court’s October 7, 2021 Order.

8           NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

9           1.       The parties have largely reached agreement regarding the schedule and procedure for  
 10 Defendants’ review and production of search term results and transactional data.

11           2.       The parties will submit a letter brief to the Court regarding the remaining disputed  
 12 issue by Friday, October 29, 2021. The issue pertains to whether documents should be collected and  
 13 reviewed from two additional custodians.

14           3.       Defendants have completed their document collection in accordance with the  
 15 February 19, 2021 ESI Order (“ESI Order”) for all custodians identified in the 2021-10-26  
 16 Telescope Search Terms and Custodians excel sent by IPP Counsel Alejandra C. Salinas on October  
 17 26, 2021 (“Search Terms and Custodians Excel”).

18           4.       Defendants will run the “Applicable Search Terms” without technology assisted  
 19 review as set forth in the Search Terms and Custodians Excel. Defendants will begin their review  
 20 on November 1, 2021. As a part of this review, Defendants will keep track of any documents that  
 21 are subject of any objection disputes to facilitate future production in the event the Court orders such  
 22 production. Plaintiffs will identify all remaining objection disputes by October 28, 2021.

23           5.       By no later than November 3, 2021, the parties will stipulate to a schedule to resolve  
 24 all remaining disputes regarding Defendants’ RFP objections.

25           6.       By no later than November 15, 2021, Defendants will make a substantial production.

26           7.       By no later than December 1, 2021, all Defendants will complete their production of  
 27 transactional data. By December 1, 2021, Defendants will also substantially complete their

1 production of all responsive non-privileged documents that identify one or more of the following  
 2 individuals in the “AllCustodian” metadata field: Corey Lee, Victor Aniceto, Joseph Lupica, and/or  
 3 Dave Anderson (“December 1 Production”).

4       8. By no later than December 13, 2021, Defendants will produce a privilege log  
 5 identifying all responsive documents that have been withheld or redacted from the December 1  
 6 Production in accordance with Section V of the ESI Order.

7       9. By no later than January 3, 2022, Defendants will substantially complete their  
 8 production of all responsive non-privileged documents that identify one or more of the following  
 9 individuals in the “AllCustodian” metadata field: David Shen, Sylvia Shen, Jack Shen and/or Jean  
 10 Shen (“January 3 Production”).

11       10. By no later than January 13, 2022, Defendants will produce a privilege log  
 12 identifying all responsive documents that have been withheld or redacted from the January 3  
 13 Production in accordance with Section V of the ESI Order.

14       11. By no later than February 15, 2022, Defendants will substantially complete their  
 15 production of all remaining responsive non-privileged documents (“February 15 Production”).

16       12. By no later than February 25, 2022, Defendants will produce a privilege log  
 17 identifying all responsive documents that have been withheld or redacted from the February 15  
 18 Production in accordance with Section V of the ESI Order.

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20 Dated: October 26, 2021

Respectfully Submitted,

21       */s/ Kalpana Srinivasan*

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52 *David Shen; Suzhou Synta Optical Technology Co.,*

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54 Case No. 5:20-cv-03639-EJD-VKD  
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1 *Ltd.; Nantong Schmidt Opto-Electrical Technology*  
2 *Co. Ltd.; Synta Technology Corp.; SW Technology*  
3 *Corporation; Synta Canada International*  
4 *Enterprises Ltd.; Olivon Manufacturing Co. Ltd.; Joe*  
5 *Lupica; Dave Anderson; Olivon USA; and Pacific*  
6 *Telescope Corp.*

7 **FILING ATTESTATION**

8 I, Alejandra C. Salinas, am the ECF User whose ID and password are being used to file this  
9 document. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have concurred  
10 in this filing.

11 By: */s/ Alejandra C. Salinas*  
12 Alejandra C. Salinas

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## [PROPOSED] ORDER

PURSUANT TO THE JOINT STIPULATION, IT IS SO ORDERED.

DATED: \_\_\_\_\_

Hon. Virginia K. DeMarchi  
United States District Judge